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Legal Department

July 23, 2021

The Honorable Greta See
The Honorable Sarah Parrot
Attorney Examiners
Public Utilities Commission of Ohio
180 East Broad Street
Columbus Ohio 43215-3793

Steven T. Nourse
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Re: *In the Matter of the Application of Ohio Power Company to Update its gridSMART Phase 2 Rider rates*, Case No. 19-1029-EL-RDR

Dear Examiners:

On December 2, 2020, the Staff of the Public Utilities Commission of Ohio (Staff) issued its Review and Recommendation in regard to Ohio Power Company's (the Company or AEP Ohio) 2019 gridSMART Phase 2 quarterly Rider Filings in Case No. 19-1029-EL-RDR. The Company issued its reply comments to the Staff's Review and Recommendation on February 5, 2021. Finally, on June 15, 2021 the Ohio Consumers' Council (OCC) issued its reply to AEP Ohio's comments to the Staff's Review and Recommendation.

The Company notes that the audit period for this proceeding is for the year of 2019 and is exclusively related to the expenditures and non-financial data for that period. The annual audits were approved in the gridSMART Phase 2 Order on February 1, 2017 in Case No. 13-1939-EL-RDR. The Commission approved the continuation of the gridSMART Phase 2 (GSP2) rider on April 25, 2018 in Case No. 16-1852-EL-SSO (ESP 4) for the term commencing June 1, 2018 through May 31, 2024. Much of OCC's comments are outside the scope of this proceeding. The majority of OCC's comments were written to take issue with portions of the GSP2 program as a whole with no regard for the GSP2 audit time frame. While other OCC comments were used as claims to deny portions of the Company's gridSMART Phase 3 proposal in Case No. 19-1475-EL-RDR (Phase 3), some of which had been previously addressed in AEP Ohio's Phase 3 reply comments filed on September 25, 2020. To the minimal extent OCC's comments address the appropriate issues related to this proceeding, other than relative generic support of Staff's recommendations; the comments do not add any credible arguments to the Staff's recommendations on these issues and are therefore merit no additional response from the Company.

AEP Ohio respectfully requests the Commission disregard OCC's recommendations as they are misplaced, out of scope, and add no credible arguments. The Company recommends the Commission approve AEP Ohio's recommendations as addressed in its initial comments filed on February 5, 2021.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "Steve Van". The signature is fluid and cursive, with a long horizontal stroke across the middle.

cc: Parties of Record

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in

Case No(s). 19-1029-EL-RDR

Summary: Correspondence - Ohio Power Company Submits Its Letter to Attorney Examiners for the above-referenced case electronically filed by Mr. Steven T Nourse on behalf of Ohio Power Company